Daniel P. Jones, Esq. Stern & Eisenberg, PC 1581 Main Street, Suite 200 The Shops at Valley Square Warrington, PA 18976 Telephone: (215) 572-8111 Facsimile: (215) 572-5025

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)

In Re:	
Jeremias Del Villar	
Xiomara Del Villar	Chapter 13
Debtors	_
	Case Number: 16-14184-pmm

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

U.S. Bank National Association, not in its individual capacity, but solely as legal title trustee for BCAT 2016-18TT has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) in order to proceed with its rights under non-bankruptcy law with regard to the Property, located at 647 East Wyoming Street, Allentown, PA 18103.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before April 12, 2020, you or your attorney must do all of the following:
  - (a) file an answer explaining your position with the Clerk's Office located at:

Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia: In Reading:

900 Market Street, Suite 400 The Gateway Building
Philadelphia, PA 19107-4299 201 Penn Street, 4<sup>th</sup> Floor
Reading, PA 19601

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If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Daniel P. Jones, Esq. Stern & Eisenberg, PC 1581 Main Street, Suite 200 The Shops at Valley Square Warrington, PA 18976 Telephone: (215) 572-8111 Facsimile: (215) 572-5025 djones@sterneisenberg.com

and to the Trustee:

Date: March 26, 2020

Scott F. Waterman Ch. 13 Trustee 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on April 21, 2020 at 10:00 am at the United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4<sup>th</sup> Floor, Reading, PA 19601.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

STERN & EISENBERG, PC

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